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Superior Court of California
County of Los Angeles

OCT 18 2018

Sherri R. Carter, Executive Officer/Clerk of Court
By: Judi Lara, Deputy

12 Attorneys for Plaintiff

13 NO FEE – GOV'T CODE § 6103

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

16 THE PEOPLE OF THE STATE OF CALIFORNIA,

17 Plaintiff,

18 vs.

19 HOOVER GARDENA INVESTMENT, LLC, a
20 California limited liability corporation; and DOES 1
21 through 50, inclusive,

22 Defendants.

Case No. 18STCV01241
COMPLAINT FOR ABATEMENT
AND INJUNCTION

[CIVIL CODE SECTION 3479 ET
SEQ.; BUS. & PROF. CODE
SECTION 17200 ET SEQ.]

(Unlimited Action)

23 PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

24 I. INTRODUCTION

25 1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the
26 State of California ("People"), for the purpose of abating a gang-related public nuisance that
27 exists at a 4-unit retail commercial property located at 832 West Gardena Boulevard in the
Harbor Gateway neighborhood in South Los Angeles ("Property"). The captioned defendant
("Defendant") owns the Property, which is located within less than 300 feet of a middle school,
a Boys & Girls Club, and a church.

28 2. For at least a decade, members and associates of an active and violent criminal

1 street gang called Gardena 13 (or "G13) have congregated at the Property on a nearly
2 constant basis and have brazenly "claimed" the Property – which is emblazoned with a mural
3 of the Virgin Mary that lists the various Gardena 13 cliques or "sets," in addition to dozens of
4 gang graffiti tags – as the symbolic heart of the gang's turf. Since 2006 the Property or its
5 immediate environs have been the site of, among other gang-related criminal and nuisance
6 activity, two homicides, an attempted murder, multiple assaults and robberies, and two
7 instances of gang members in possession of guns. Los Angeles Police Department ("LAPD")
8 officers walking foot patrols in the surrounding neighborhood, or attending events at the nearby
9 school, have for years received complaints from community members about the Property's
10 dangerousness.

11 3. LAPD and nuisance abatement prosecutors in the Los Angeles City Attorney's
12 office met informally with the former owners of both the Property, and a laundromat business
13 occupying one of the Property's units, in 2015, to discuss the gang activity there. This meeting
14 prompted the installation of an internet-connected, police-accessible video monitoring system.
15 The front door to the laundromat was also locked (laundromat customers instead accessed the
16 business through a door off the Property's rear parking lot). These discreet measures had
17 positive effects on the gang activity at the Property.

18 4. In approximately early 2018, around a year after Defendant acquired the
19 Property, LAPD noted that the camera system had become inoperable. An LAPD senior lead
20 officer in charge of community policing and quality of life issues in the Property's area
21 repeatedly attempted to contact Defendant, including driving miles to residential and business
22 addresses associated with Defendant, leaving business cards, and attempting to reach
23 Defendant's principal by phone. The officer was alternately ignored, put off, passed around
24 from one unresponsive person to another, or promised things that never occurred.

25 5. Nuisance abatement prosecutors got re-involved and, starting in mid-July 2018,
26 sent two separate letters proposing a meeting to last-known addresses for Defendant, which
27 were ignored. Due to the seriousness of the public safety issues at the Property, prosecutors
28 continued their efforts to contact Defendant and eventually reached Defendant's registered

1 agent for service of process. The agent directed prosecutors not to Defendant, *per se*, but
2 rather to an affable real estate broker, Mr. Nourai, who had previous business dealings with
3 Defendant's principal, but who did not otherwise have a formal role with Defendant, or
4 substantial knowledge regarding the Property. Nourai stated that the meeting proposed by
5 prosecutors could not take place for weeks due to travel plans. Prosecutors' suggestion to
6 Nourai that the video system could at least be worked on during any such travel was effectively
7 ignored for weeks. About the only salient revelations to emerge from these odd interactions
8 with Defendant's ostensible emissary were that, on information and belief, Defendant's
9 principal had rarely, if ever, visited the Property and that the Property was not otherwise being
10 professionally managed except for a two-month interlude in July and August 2018, after which
11 the management company left because its cleaning crew was intimidated by the gang.

12 6. The public safety risks at the Property driving LAPD's and prosecutors'
13 unreciprocated outreach to Defendant are serious. Among other things, in separate incidents,
14 one gang member was shot dead while standing in front of the Property in 2007. In that same
15 year, gang members jumped a customer coming out of a store at the Property, warning, "This
16 is Gardena hood." In 2008, two innocent laundromat customers were shot at in the Property's
17 parking lot by a gunman in a car, under circumstances indicative of a gang-related *modus*
18 *operandi*; responding officers found one victim with multiple bullet wounds to the torso lying in
19 the center aisle of the laundromat. Another gang member made it into the laundromat on the
20 Property after being shot on the sidewalk in front of the Property in 2009, before collapsing
21 inside the Property near the laundromat's restroom and being pronounced dead shortly
22 thereafter.

23 7. More recently, a janitor found a loaded gun stashed in the laundromat bathroom
24 in 2014. In 2017, after Defendant acquired the Property, three bullet casings were found
25 directly in front of the unit at the Property housing a liquor store, after witnesses reported
26 hearing shots fired. Also in 2017, a gang member repeatedly collected extortionate "taxes"
27 from one store at the Property, warning a store employee, "You don't want me to come back
28 with the homies." LAPD officers caught a G13 gang member with a gun inside the former

1 liquor store at the Property on the last day of 2017. In August 2018 a person who had
2 somehow begun living in the backroom of the beauty shop at the Property criminally
3 threatened the business owner when she tried to eject him. As recently as September 7,
4 2018, several G13 gang members were spotted inside the laundromat and then detained
5 and/or arrested in connection with fresh gang graffiti that had been spray-painted on the
6 Property.

7 8. The pattern of gang-related nuisance activity at the Property – which is likely
8 under-reported due to retaliation fears amongst law-abiding community members -- began
9 before Defendant's acquisition of the Property at the beginning of 2017, but has persisted
10 since then, up to the present. For instance, in addition to the aforementioned incidents, LAPD
11 has had to detain groups of gang members “hanging out” -- either just outside the Property on
12 the public sidewalk, inside the Property, or moving in and out of the Property -- at least 14
13 times since Defendant purchased the Property.

14 9. Because of the persistence and consistency of the gang presence at the
15 Property, LAPD officers feel compelled to, and do, visit the Property on almost every one of
16 their available shifts, to the present. The same is substantially true for the Gardena Police
17 Department (“GPD”), whose jurisdictional border lies just one block west of the Property. Both
18 LAPD and GPD officers report seeing known G13 gang members inside or just outside of the
19 Property, or running into the front door of the laundromat and then out the back door to flee
20 police scrutiny, for instance, during nearly every patrol they conduct in the Property’s vicinity,
21 up to the present time.

22 10. Plaintiff understands that the nuisance at the Property is challenging. The
23 Property’s commercial units are open to the public, so access cannot be limited in the same
24 fashion, for instance, as an apartment building experiencing gang problems. Crime and
25 nuisance activity on the adjacent public sidewalks are not Defendant’s sole responsibility. The
26 nuisance at the Property started before Defendant acquired the Property (though Defendant
27 has owned the Property for almost two years at this point).

28 11. However, when a street gang has “claimed” the Property as has happened here

1 and the gang uses the Property as a *de facto* graphical billboard in the form of the
2 aforementioned mural and graffiti; and when, crucially, these same gang members so regularly
3 enter the Property and cause its physical spaces to be used for serious, violent crime or its
4 aftermath, as a hiding place or escape route from police, or as a social “hangout,” then *the*
5 *Property is a nuisance*, regardless of the nuances of how best to abate that nuisance.

6 12. Plaintiff in this Action seeks only managerial and physical improvements at the
7 Property that are feasible and reasonable to protect public safety and to stop the Property's
8 drain on scarce police resources. Lighting, video monitoring, targeted ingress and egress
9 control, independent professional property management, possible private security patrols –
10 these are hardly unreasonable measures to consider in this situation. Doing *nothing*, or
11 engaging in half-measures, in contrast -- and blatantly ignoring or slow-walking urgent
12 entreaties from public law enforcement authorities about insidious public safety risks
13 associated with the Property, as Defendant has done – is unacceptable morally, ethically, and
14 legally.

15 13. The denouement of this sorry storyline is that just days before the filing of this
16 Action, two nuisance abatement prosecutors and three uniformed LAPD officers visited the
17 Property during daylight hours. It was, as always, tagged up with gang graffiti. Moreover, the
18 now-vacant premises of the liquor store unit at the Property was not properly secured and an
19 older G13 gang member was living in the back room of the liquor store, which was decorated
20 with a Green Bay Packers “G” symbol favored by the gang. Additionally, the cameras on the
21 video system looked as if they had been repaired or replaced, and these cameras were indeed
22 providing a live video feed into a monitor located, strangely enough, in one of the vacant units
23 at the Property. Neither prosecutors nor LAPD had been informed of this fact and, if the
24 system was internet-connected, were not given instructions for accessing the feeds online so
25 that LAPD, in particular, could resume using the system to directly observe the Property, rather
26 than having to rely on frequently intimidated civilians to report any problems.

27 14. Coincidentally (*or not*), while the officers and prosecutors were still at the
28 Property, Defendant's real estate broker emissary, Mr. Nourai, sent an email to one of the

prosecutors, after being *incommunicado* for a month since the prosecutor's last email to him. Consistent with Defendant's pattern of doing as little as possible (or nothing) in regards to the issues at its Property, the email announced the video system's restoration (but did not explain how it might be accessed remotely and actually used by police) *and* asked for law enforcement's assistance in removing the person living in the vacated liquor store, which is a matter that would normally be handled privately by competent and professional property owners/managers, barring any special need for law enforcement to intervene if a need arose, and as legally appropriate. To boot, the very next morning, Defendant's principal himself surfaced for the first time in three months and left a voicemail for one of the prosecutors, again touting the cameras and asking for help with the trespasser in the liquor store.

15. The intent of this nuisance abatement prosecution is to end this alternately non-responsive, dilatory, superficial, incomplete, you-scratch-my-back-I-scratch-yours transactional posture by Defendant, and to induce the requisite level of sustained attention and effort by Defendant to manage and equip the Property so as to address the significant but surmountable public safety challenges there. Plaintiff, working in collaboration with LAPD and other partners, has secured such outcomes repeatedly in similar past cases, to the enduring benefit of not only law-abiding residents and neighbors of the affected properties, but to the defendant-owners, as well. Plaintiff seeks, through this prosecution, to achieve the same result at the property complained of herein.

II. THE PARTIES AND THE PROPERTY

A. Plaintiff

16. Plaintiff, the People, is the sovereign power of the State of California designated in Code of Civil Procedure section 731 and Business and Professions Code section 17204 to be the complaining party in law enforcement actions brought to abate, enjoin and penalize public nuisances and unlawful business practices.

B. Defendant

17. Defendant Hoover Gardena Investment LLC ("Defendant") is a California limited liability company ("LLC"). Defendant is the record owner of the Property and it -- or an

1 affiliated predecessor entity -- has been the owner since approximately January 30, 2017.

2 18. The true names and capacities of defendants sued herein as Does 1 through 50,
3 inclusive, are unknown to Plaintiff, who therefore sues said defendants by such fictitious
4 names. When the true names and capacities of said defendants have been ascertained,
5 Plaintiff will seek leave of Court to amend this Complaint and to insert in lieu of such fictitious
6 names the true names and capacities of said fictitiously named defendants. (All references
7 hereinafter to "Defendant" incorporate and include Does 1 through 50.)

8 **C. The Property**

9 19. The Property is comprised of four attached commercial retail storefronts located
10 on Gardena Boulevard at the intersection with Ainsworth Street. The Property's commonly
11 known address is 832 West Gardena Boulevard, Los Angeles, California 90247, in the Harbor
12 Gateway neighborhood in South Los Angeles.¹ All four storefronts open on to the south
13 sidewalk of Gardena Boulevard. At various points in time the storefronts have been occupied
14 by a laundromat business, a cell phone store, a liquor store, and a beauty parlor. Plaintiff is
15 informed that at the time of this Complaint, only the laundromat and beauty parlor are in
16 operation, with the liquor store having recently gone out of business, leaving two of the four
17 retail units at the Property vacant as of this time. The Property also includes an open,
18 unsecured surface parking lot located behind the commercial units, to the south of the building
19 on the Property.

20 **III. THE PUBLIC NUISANCE LAW**

21 20. "Abatement of nuisances is a long established and well recognized exercise of
22 the state's police power." (People ex rel. Hicks v. Sarong Gals (1974) 42 Cal.App.3d 556, 563;
23 People ex rel. Bradford v. Barbiere (1917) 33 Cal.App. 770, 775-778.) Civil Code section 3479
24 defines a nuisance as "[a]nything which is injurious to health, including, but not limited to, the
25 illegal sale of controlled substances, or is indecent or offensive to the senses, or an obstruction

27
28 ¹ The Property's legal description is: "Lot 19 and 20, in Block "C", in the Town of Gardena, in the City of Los Angeles, County
of Los Angeles, State of California, as per map recorded in Book 43, Page 5 of miscellaneous Records of said County,"
Assessor's Parcel Number 6121-007-022.

1 to the free use of property, so as to interfere with the comfortable enjoyment of life or property .
2 . . ." (Bakersfield v. Miller (1966) 64 Cal.2d 93, 99 ["The Legislature has defined in general
3 terms the word 'nuisance' in Civil Code section 3479".])

4 21. Civil Code section 3480 defines a public nuisance as "one which affects at the
5 same time an entire community or neighborhood, or any considerable number of persons,
6 although the extent of the annoyance or damage inflicted upon individuals may be unequal."
7 In particular, drug dealing, loitering, consumption of alcohol and illegal drugs, and boisterous
8 conduct which creates a hooligan-like "atmosphere" constitutes a public nuisance. (People ex
9 rel. Gallo v. Acuna (1997) 14 Cal.4th 1090, 1120.)

10 22. Under Civil Code section 3491, "The remedies against a public nuisance are: 1.
11 Indictment or information; 2. A civil action; or, 3. Abatement." "An abatement of a nuisance is
12 accomplished by a court of equity by means of an injunction proper and suitable to the facts of
13 each case." (Sullivan v. Royer (1887) 72 Cal. 248, 249.)

14 23. Code of Civil Procedure section 731 authorizes a city attorney to bring an action
15 to enjoin or abate a public nuisance. It provides, in pertinent part, "A civil action may be
16 brought in the name of the people of the State of California to abate a public nuisance . . . by
17 the city attorney of any town or city in which the nuisance exists." (*Ibid.*)

18 24. A successive owner of a property is liable for a continuing nuisance at the
19 property that started under a former owner, if the successive owner neglects to abate the
20 nuisance. (Cal. Civ. Code, § 3483.) Moreover, a repetitive pattern of nuisance activity that
21 began under a former owner will be presumed to continue, repeat and recur under a
22 subsequent owner. (See Cal. Civ. Code, § 3547 ["A thing continues to exist as long as is usual
23 with things of that nature."].)

24 IV. UNFAIR COMPETITION LAW

25 25. The practices forbidden by the state Unfair Competition Law at Business and
26 Professions Code section 17200 *et seq.* ("UCL") are any business practices forbidden by law,
27 be it criminal, federal, state, municipal, statutory, regulatory or court-made. As the California
28 Supreme Court has explained, the UCL "borrows" violations of other laws and treats them as

1 unlawful practices independently actionable under section 17200 et seq.” (*South Bay*
2 *Chevrolet v. General Motors Acceptance Corp.* (1999) 72 Cal.App.4th 861, 880 (internal
3 citations and quotation marks omitted).)

4 26. As proscribed by the UCL, “[a]n ‘unlawful business activity’ includes anything that
5 can properly be called a business practice and that at the same time is forbidden by law.”
6 (*People v. McKale* (1979) 25 Cal.3d 626, 632.) The ownership and operation of a large rental
7 apartment complex, such as the Property, by sophisticated nonresident owners doing so for
8 the purposes of profit, is, axiomatically, a business under the UCL. (See *People ex. rel. City of*
9 *Santa Monica v. Gabriel* (2010) 186 Cal.App.4th 882, 888 [“The renting of residential housing
10 is a business.”].) Thus, when a property owner conducts, maintains or permits a nuisance that
11 is unlawful under the PNL to exist on the premises of such a property, it is a violation of the
12 UCL.

13 27. Moreover, the UCL casts a broad net. “Any person performing or proposing to
14 perform an act of unfair competition may be enjoined . . .” (Bus. & Prof. Code, § 17203;
15 emphasis added.) The term person includes “natural persons, corporations, firms,
16 partnerships, joint stock companies, associations and other organizations of persons.” (Bus. &
17 Prof. Code, § 17201.) The courts have expanded section 17200’s net beyond direct liability to
18 include common law doctrines of secondary liability where the liability of each defendant is
19 predicated on his or her personal participation in the unlawful practices. (*People v. Toomey*
20 (1985) 157 Cal.App.3d 1, 14; *Emery v. Visa Int’l Service Ass’n* (2002) 95 Cal.App.4th 952,
21 960.)

22 28. Civil actions under the UCL may be brought in the name of the People of the
23 State of California by any city attorney of a city having a population in excess of 750,000 (Bus.
24 & Profs. Code, § 17204), such as the City of Los Angeles. A public entity can sue pursuant to
25 section 17200 based on violations of its own municipal code, state law, or other local
26 ordinance. (*People v. Thomas Shelton Powers, M.D., Inc.* (1992) 2 Cal.App.4th 330, 338-339.)

27 29. Defendants engaging in violations of the UCL may be enjoined in any court of
28 competent jurisdiction. (Bus. & Profs. Code, § 17203.) A court may make such orders or

¹ judgments, including appointment of a receiver, as may be necessary to prevent the use or
² employment by any person of any practice constituting unfair competition. (*Id.*)

V. FIRST CAUSE OF ACTION FOR PUBLIC NUISANCE

[Civil Code Section 3479, et seq. --

Against Defendant and DOES 1 through 50]

30. Plaintiff incorporates by reference Paragraphs 1 through 29 of this Complaint and makes them part of this First Cause of Action as though fully set forth herein.

31. Since at least 2006 and continuing through the present, including since Defendant acquired the Property in January 2017, Defendant and DOES 1 through 50 have owned, operated, and used, and/or directly or indirectly permitted to be occupied and used, the Property in such a manner as to constitute a public nuisance in violation of Civil Code sections 3479 and 3480. The public nuisance, as described herein, is injurious to health, indecent or offensive to the senses, and/or an obstruction to the free use of property, so as to substantially and unreasonably interfere with the comfortable enjoyment of life or property by those persons frequenting the Property and living in the surrounding community. The public nuisance consists of, but is not limited to, the regular, menacing, intimidating, violent and disorderly presence of gang members and/or associates at the Property; the occurrence of violent crime including homicide, gunfire and the illegal presence of firearms on the Property; the tendency of the Property to attract gunfire and other menacing and dangerous conduct from rival gangs because of the historical and current presence of gang members and associates at the Property; and the occurrence of other gang-related crime at the Property.

32. Defendant, who owns and/or controls the Property, and DOES 1 through 50, knew or should have known about the nuisance activity at the Property, and failed to take reasonable steps to prevent or abate the ongoing nuisance, and as result of this failure and their mismanagement of the Property, they have caused and/or contributed to a serious threat to the general health, safety, and welfare of the law-abiding business tenants and their customers at the Property and persons in the surrounding community.

33. Unless Defendant, and DOES 1 through 50, are restrained and enjoined by order

1 of this Court, they will continue to use, occupy and maintain, and to aid, abet or permit, directly
2 or indirectly, the use, occupation, and maintenance of the Property, together with the fixtures
3 and appurtenances located therein, for the purpose complained of herein, to the great and
4 irreparable damage of Plaintiff and in violation of California law.

5 **VI. SECOND CAUSE OF ACTION FOR UNFAIR COMPETITION**

6 **[Business and Professions Code Section 17200, *et seq.* --**

7 **Against Defendant and DOES 1 through 50]**

8 34. Plaintiff hereby incorporates by reference paragraphs 1 through 33 of this
9 Complaint and makes them part of this Second Cause of Action, as if fully set forth herein.

10 35. Ownership and operation of the Property is a business. When the owner and/or
11 manager of such a business violates the PNL such that a nuisance exists and flourishes at the
12 business' premises, as alleged herein, it is also a violation of the UCL.

13 36. Defendant and DOES 1-50 have violated the UCL by conducting, maintaining
14 and/or permitting, directly or indirectly, a nuisance in violation of the PNL at the Property, as
15 alleged herein.

16 37. Plaintiff has no adequate remedy at law, and unless Defendant and DOES 1-50
17 are restrained by this Court they will continue to commit unlawful business practices or acts,
18 thereby causing irreparable injury and harm to the public's welfare.

19

20 **PRAYER**

21 **WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND
22 DECREE AS FOLLOWS:**

23 **AS TO THE FIRST CAUSE OF ACTION**

24 1. That the Property, together with the fixtures and moveable property therein and
25 thereon, be declared a public nuisance and be permanently abated as such in accordance with
26 Civil Code section 3491.

27 2. That each Defendant and their agents, officers, employees and anyone acting on
28 their behalf, and their heirs and assignees, be preliminarily and perpetually enjoined from

1 operating, conducting, using, occupying, or in any way permitting, directly or indirectly, the use
2 of the Property as a public nuisance. Such orders should include, but not be limited to physical
3 and managerial improvements to the Property, including but not limited to a robust internet-
4 connected, LAPD-accessible video monitoring system and private security, and such other
5 orders as are appropriate to remedy the nuisance on the Property and enhance the abatement
6 process.

7 3. That Plaintiff be granted such other and further relief as the Court deems just and
8 proper, including closure and/or demolition of the Property.

9 AS TO THE SECOND CAUSE OF ACTION

10 1. That Defendant be declared in violation of Business and Professions Code
11 section 17200.

12 2. That Defendant, as well as its agents, heirs, successors, and anyone acting on
13 its behalf, be permanently enjoined from maintaining, operating, or permitting any unlawful or
14 unfair business acts or practices in relation to the Property in violation of Business and
15 Professions Code section 17200.

16 3. That the Court grant a preliminary and/or permanent injunction prohibiting
17 Defendant, as well as its agents, heirs, successors, and anyone acting on its behalf, from
18 engaging in the unlawful or unfair acts and/or practices described herein at the Property and in
19 the City of Los Angeles. Such orders should include physical and managerial improvements to
20 the Property.

21 4. That, pursuant to Business and Professions Code section 17206, Defendant and
22 DOES 1-50, be assessed a civil penalty of \$2,500 for each and every act of unfair competition.
23 Since Defendant and DOES 1 through 50, have engaged in and/or failed to abate a continuing
24 nuisance, each day constitutes an act of unfair competition and Defendant , and DOES 1
25 through 50, should be assessed a civil penalty not to exceed \$3.65 million dollars.

26 5. That, pursuant to the Court's equitable power and Business and Professions
27 Code section 17203, the Court make such orders or judgments, including appointment of a
28 receiver, to eliminate the unfair competition alleged herein.

1 AS TO ALL CAUSES OF ACTION

2 1. That Plaintiff recover the amount of the filing fees and the amount of the fee for
3 the service of process or notices which would have been paid but for Government Code
4 section 6103.5, designating it as such. The fees may, at the Court's discretion, include the
5 amount of the fees for certifying and preparing transcripts.

6 2. That Plaintiff be granted such other and further relief as the Court deems just and
7 proper.

8
9 DATED: October 17, 2018

Respectfully submitted,

10 MICHAEL N. FEUER, City Attorney
11 ARTURO A. MARTINEZ, Deputy Chief
12 JONATHAN CRISTALL, Assistant City Attorney
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